

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

Criminal No. 2:21-184

RODERICK KING

**SNAPCHAT SUPPLEMENT TO GOVERNMENT’S MOTION IN LIMINE  
REGARDING APPLE, GOOGLE, AND PNC BANK BUSINESS RECORDS AT TRIAL**

AND NOW comes the United States of America, by its attorneys, Cindy K. Chung, United States Attorney for the Western District of Pennsylvania, and Jeffrey R. Bengel and Rebecca L. Silinski, Assistant United States Attorneys for said District, and hereby submit this supplement to [147], the government’s motion in limine regarding Apple, Google, and PNC Bank business records at trial.

On June 13, 2022, the government filed a motion in limine arguing that proposed exhibits 2 through 8 were self-authenticating and admissible as business records under Federal Rules of Evidence 803(6) and 902(11). In support of that argument, the government attached business records certifications from Google, Apple, and PNC Bank. In this supplement to that motion, the government now submits that proposed exhibit 1, subscriber records obtained from Snapchat, is also self-authenticating and admissible, for the same reasons identified in [147] the government’s motion in limine. A business records certification received from Snapchat and dated December 15, 2020 is attached as Exhibit A.

Because the certified records meet the requirements for self-authentication under Rule 902(11) and admissibility under Rule 803(6), the Court should enter an order admitting these

documents into evidence (and obviating the need for the government to call a records custodian for said records).

Respectfully submitted,

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